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Claims 1-12 and 14-20 are pending. Claim 13 is canceled and Claim 14 is amended in this Response.

Claims 1-20 were rejected under Section 102 as being anticipated by Henry (6,681,392) or under Section 103 as being obvious over Henry in view of admitted prior art.

**Claims 1-7 – Installing Peripheral Software In Response
To Initialization Of The Driver.**

Claim 1 recites installing peripheral software in response to initialization of the device driver on the client computer. "Peripheral software" is specially defined in the Specification as "any manufacturer provided software designed to accompany a device driver for a peripheral." Specification, page 3, lines 12-13. Henry discloses a software system running on a server computer that can install drivers and other programming for a peripheral on a client computer. There is nothing in Henry that teaches or suggests initializing a driver on the client computer somehow triggers installing other peripheral programming on the client computer, in general, and more specifically, manufacturer provided software designed to accompany a device driver for a peripheral. That is to say, Henry does not anticipate or make obvious installing peripheral software in response to initialization of the device driver on the client computer as required in Claim 1.

In support of the rejection of Claim 1, the Examiner asserts that the text at column 5, lines 48-58 and column 6, lines 21-34 in Henry teach the installing element of Claim 1. This assertion is not correct. The cited text is quoted below.

"Standard operating system function calls are used to access the information needed from the remote system. It is necessary, however, to communicate to the driver being initialized on the remote system, that the install is a remote install. Certain drivers perform initialization routines, such as inkjet head alignment, that require user intervention during the install process. For a remote install, such processes need to be suppressed. The install program sets values in the remote registry signaling to the driver that the install is a remote install and that any initialization requiring user intervention must be suppressed."
Henry, column 5, lines 48-58.

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"Module 709 sets driver customization flags. Module 711 creates the drivers and printer objects on remote system 712. Driver installation

module 710 controls this operation, and passes a list of printer objects to module 711. The remote system information subsystem 708 passes system and printer directories to the file copy subsystem and registry information to the driver installation subsystem. The file copy subsystem retrieves a file copy list from the install engine 702. Install engine 702 retrieves a list of software to install from installation GUI 701 during the installation process for determining which software is to be part of the installation and which options are to be applied. As previously discussed, this determination can be made by direct user input, or by executing a script file." Henry, column 6, lines 21-34.

Suppressing processes that require user intervention, as discussed in the column 5 quote from Henry, has no relevance to the installing element of Claim 1. The fact that Henry's installation program might signal the driver to suppress such processes during initialization says nothing about installing peripheral software in response to initialization of the driver. If the Examiner disagrees, he is respectfully requested to explain the relevance of suppressing processes that require user intervention to installing peripheral software in response to initialization of the driver.

Using a script file to determine which software will be part of the installation, as discussed in the column 6 quote from Henry, also has no relevance to the installing element of Claim 1. It is evident from the discussion at column 4, lines 63-65, as well as the discussion at column 6 quoted above, that Henry's script file contains a list of pre-selected programs to be installed. The script runs on the server computer as part of the installation software. Nothing in Henry suggests the installation of one program on the list is triggered by the initialization on the client computer of a driver or any other program on the list. Again, if the Examiner disagrees, he is respectfully requested to explain the relevance of Henry's script file to the installing element of Claim 1.

For these reasons, Claim 1 is felt to distinguish patentably over Henry. Claims 2-7 are also felt to distinguish patentably over Henry due to their dependence on Claim 1.

Further with regard to Claim 4, Henry does not teach or suggest modifying the driver to read the description file (the description file includes a name of the peripheral software and an installation procedure). The Examiner asserts that Henry's script file is the claimed description file. Office Action, page 5. Even if it is assumed that the assertion is correct, it is clear that Henry does not modify a driver to

read the script file. Rather, the script file is read by the installation program. For this additional reason, Claim 4 distinguishes patentably over the Henry.

**Claims 8-12 and 14-20 – Reading A Description File In Response
To Initialization Of The Driver.**

Claim 8 recites reading a description file associated with a peripheral in response to initialization of the driver for the peripheral. The Examiner asserts that Henry's script file is the claimed description file. Office Action, page 3. Even if it is assumed the assertion is correct, it is clear that Henry does not read the script file in response to initialization of the driver. The Examiner seems to suggest that the "response" limitation in this element of Claim 8 is met in Henry by signaling the driver that the installation is a remote installation and that any initialization requiring user intervention must be suppressed. Office Action, page 3, citing Henry, column 5, lines 44-58.

Applicants fail to see the relevance of this passage in Henry to the claim limitation. Nothing in this passage of Henry (or anything else in Henry) suggests reading the script file in response to initialization of the driver. The fact that Henry's installation software might signal the driver to suppress processes requiring user intervention says nothing about reading the script file in response to driver initialization. If the Examiner disagrees, he is respectfully requested to explain the relevance of Henry's user intervention suppression process to the reading element of Claim 8.


For these reasons, Claim 8 is felt to distinguish patentably over Henry. Claims 9-12 are also felt to distinguish patentably over Henry due to their dependence on Claim 8.

Claim 14 recites a processor configured to read a description file in response to initialization of the driver. For the reasons noted above for Claim 8, Claim 14 is felt to distinguish patentably over Henry. Claims 15-20 are also felt to distinguish patentably over Henry due to their dependence on Claim 14.

Further with regard to Claim 10, Henry does not teach or suggest modifying the driver to read the description file. Henry does not modify a driver to read the script file. Rather, the script file is read by the installation program. For this additional reason, Claim 10 distinguishes patentably over the Henry.

The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,



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